

UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF MASSACHUSETTS

ELIZABETH L. SHIELDS,
Plaintiff

v.

KENNETH VAN VOORHIS, JR.,
JOSEPH ELETTO TRANSFER, INC. and
AA TRUCK RENTING CORPORATION,
Defendants

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C.A. NO. 04-12431GAO

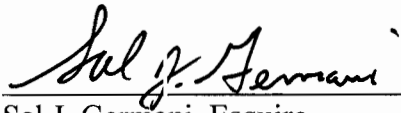
JOINT STATEMENT
PURSUANT TO LR 16.1

The Parties to the above-captioned action hereby submit the following proposed pre-trial schedule:

1. All discovery, including interrogatories, requests for production of documents, requests for admissions and depositions (excluding expert depositions), shall be completed on or before November 18, 2005.
2. The Plaintiff, Elizabeth L. Shields, may be examined by an Independent Medical Physician of defendant's choosing, on or before July 18, 2005.
3. The parties shall supplement their expert interrogatories and file their expert disclosures pursuant to F.R.C.P. 26(a)(2)(B) on or before ninety (90) days prior to trial.
4. Any expert depositions shall be completed within thirty (30) days prior to trial (the Defendant does not agree to expert depositions).
5. Any and all dispositive motions shall be filed on or before sixty (60) days prior to trial.

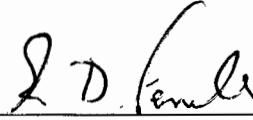
See attached Certifications relative to LR 16.1(D)(3).

Respectfully submitted,



Sal J. Germani, Esquire
BBO# 547991
Germani & Germani, P.C.
50 Union Street
PO Box 2173
Attleboro, MA 02703
(508) 222-5858

Respectfully submitted,



Paul R. Keane, Esquire
BBO# 262880
Sean D. Ferrill, Esquire
BBO# 654173
Martin, Magnuson, McCarthy & Kenney
101 Merrimac Street
Boston, MA 02114-4716
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2\shields\joint statement

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DISTRICT OF MASSACHUSETTS

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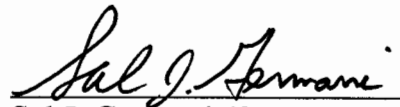
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CERTIFICATION
LR 16.1(D)(3)

I certify that Elizabeth L. Shields, Plaintiff, and her counsel, Sal J. Germani, Esquire, have conferred to establish a budget for the full litigation of the above captioned matter, as well as a budget for the various alternatives.

Further, Elizabeth L. Shields, Plaintiff, and her counsel have discussed the resolution of the litigation through the use of Alternative Dispute Resolution programs and need to develop further information before deciding whether the case is appropriate for settlement, ADR or trial.

Respectfully submitted,
The Plaintiff
By her Attorney



Sal J. Germani, Esq.
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C.A. NO. 04-12431GAO

CERTIFICATION
LR 16.1(D)(3)

I certify that Kenneth Van Voorhis, Jr., Joseph Eletto Transfer, Inc., and AA Truck Renting Corporation, Defendants, and their counsel, Paul R. Keane, Esquire and Sean D. Ferrill, Esquire, have conferred to establish a budget for the full litigation of the above captioned matter, as well as a budget for the various alternatives.

Further Kenneth Van Voorhis, Jr., Joseph Eletto Transfer, Inc., and AA Truck Renting Corporation, Defendants, and their counsel have discussed the resolution of the litigation through the use of Alternative Dispute Resolution programs and need to develop further information before deciding whether the case is appropriate for settlement, ADR or trial.

Respectfully submitted,
The Defendants,
By their Attorneys



Paul R. Keane, Esquire

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